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14 *Attorneys for Plaintiffs Jane Doe LS 333*  
15 *and Jane Doe LS 397*

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

14 IN RE: UBER TECHNOLOGIES, INC.,  
15 PASSENGER SEXUAL ASSAULT  
16 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF DAVID M. GRIMES  
IN SUPPORT OF MOTION TO  
WITHDRAW AS COUNSEL FOR  
PLAINTIFFS JANE DOE LS 333 AND  
JANE DOE LS 397**

17 This Document Relates to:

18 *Jane Doe LS 333 v. Uber Technologies, Inc., et*  
19 *al., Case No. 3:23-cv-05930-CRB*

20 *Jane Doe LS 397 v. Uber Technologies, Inc., et*  
21 *al., Case No. 3:24-cv-05864-CRB*

Judge: Hon. Charles R. Breyer  
Date: , 2025  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

I, David M. Grimes, declare as follows:

1. I am an attorney with Levin Simes LLP, counsel of record for Plaintiffs with MDL IDs 1194 and 2350 (Jane Doe LS 333 and Jane Doe LS 397, respectively) in this multidistrict litigation. I make this declaration in support of the concurrently filed Motion to Withdraw as Counsel.
2. Counsel and clients have experienced a fundamental breakdown in communication and cooperation such that continued representation is no longer possible.
3. On or about 10/14/2025, I provided written notice to Jane Doe LS 333 and Jane Doe LS 397 at their last known email addresses, with which I have successfully recently communicated with them, informing them of my firm's intent to seek withdrawal and advising that they should retain new counsel or appear pro se. I have retained a copy of that notice in my file and can submit it for in camera review if the Court so requests.
4. I have also served this motion on all parties who have appeared in the case.
5. I believe that my withdrawal will not unduly delay these proceedings. I have taken all reasonable steps to avoid prejudice to Jane Doe LS 333 and Jane Doe LS 397, including forwarding or preserving existing pleadings, scheduling information, or filing deadlines, and I will forward future court notices to Jane Doe LS 333 and Jane Doe LS 397 as required or as ordered by the Court, unless substitute counsel appears.
6. Each of these Plaintiffs is subject to a court order to produce discovery concerning purported non-bona-fide ride receipts in the coming days, including sitting for deposition. Dkt 3977. I am unaware of any responsive documents to produce. I have asked Uber's counsel to stipulate to continue the depositions until after this withdrawal motion is heard. Counsel for Uber has refused. If the depositions are not postponed until after the withdrawal, I or another attorney from my firm will defend the depositions remotely.
7. I understand that under Local Rule 11-5(b), the Court may condition withdrawal on my continuing to accept papers served on Jane Doe LS 333 and Jane Doe LS 397 and forwarding them; I am willing to accept that responsibility as ordered.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed on October 14, 2025, in San Francisco, California.

3 Respectfully Submitted,

4 **LEVIN SIMES LLP**

5 */s/ David M. Grimes*

6 David M. Grimes

7 *Attorney for Plaintiffs Jane Doe LS 333*  
8 *and Jane Doe LS 397*

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 14, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ David M. Grimes

David M. Grimes